

08-MJ-05204-CMP

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

EZEKIEL ALON HAMPTON, and,  
KATRINA MARIE GRAUMAN

Defendants.

CASE NO. MJ08-5204

COMPLAINT for VIOLATION  
Title 21, U.S.C. §§ 841(a) & (b) and 846  
Title 18, U.S.C. §§ 922(g)(1) and 924(c)

BEFORE KAREN STROMBOM, United States Magistrate Judge,  
Tacoma, Washington.

The undersigned complainant being duly sworn states:

**COUNT 1**

**(Conspiracy to distribute cocaine and cocaine base in the form of crack)**

Beginning at a time unknown but during September 2007, and continuing until on or about June 24, 2008, EZEKIEL ALON HAMPTON, KATRINA GRAUMAN, and others known and unknown, knowingly and intentionally did conspire to distribute cocaine and cocaine base in the form of crack, both substances controlled under Schedule II of Title 21, United States Code, Section 812.

The complainant alleges that this offense involves five (5) grams or more of a mixture or substance containing cocaine base in the form of crack.

1 All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

2  
3 **COUNT 2**

4 **(Possession with intent to distribute cocaine base in the form of crack)**

5 On or about June 24, 2008, at Tacoma, within the Western District of Washington,  
6 EZEKIEL ALON HAMPTON and KATRINA GRAUMAN knowingly and intentionally  
7 possessed, and aided and abetted in the possession of, with the intent to distribute, cocaine base  
8 in the form of crack, a substance controlled under Schedule II, Title 21, United States Code,  
9 Section 812.

10 The Complainant further alleges that this offense was done during and in furtherance of  
11 the conspiracy charged in Count 1 above.

12 The Complainant further alleges that this offense involved in five (5) grams or more of a  
13 mixture or substance of cocaine base in the form of crack.

14 All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

15  
16 **COUNT 3**

17 **(Possession with intent to distribute cocaine)**

18 On or about June 24, 2008, at Tacoma, within the Western District of Washington,  
19 EZEKIEL ALON HAMPTON and KATRINA GRAUMAN knowingly and intentionally  
20 possessed, and aided and abetted in the possession of, with the intent to distribute, cocaine a  
21 substance controlled under Schedule II, Title 21, United States Code, Section 812.

22 The Complainant further alleges that this offense was done during and in furtherance of  
23 the conspiracy charged in Count 1 above.

24 All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

**COUNT 4**

**(Possession of a Firearm in furtherance of a drug trafficking offense)**

On or about June 24, 2008, at Tacoma, within the Western District of Washington, EZEKIEL ALON HAMPTON and KATRINA GRAUMAN, did possess, and aid and abet in the possession of, a firearm, to wit: one Browning .25 caliber semiautomatic handgun, in furtherance of a drug trafficking offense, that is, the conspiracy to distribute cocaine and cocaine base in the form of crack, as charged in Count 1 above.

All in violation of Title 18, United States Code, Section 924(c).

**COUNT 5**

**(Felon in Possession of a Firearm)**

On or about June 24, 2008, at Tacoma, within the Western District of Washington, EZEKIEL ALON HAMPTON, having been convicted of a crime punishable by imprisonment for a term exceeding one year, to wit: Assault in the First Degree, in the King County Superior Court of Washington, cause number 92-1-08027-0 did knowingly possess a firearm that is, one Browning .25 caliber semiautomatic handgun, which has been shipped and transported in interstate commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

And the complainant further states:

1. I, Tarna Derby-McCurtain, am a Special Agent of the Federal Bureau of Investigation (FBI). I have been a Special Agent for 20 years and am responsible for investigating violations of federal law.

2. This complaint is based upon my own investigation, as well as upon information provided to me, and my review of reports prepared by, other law enforcement officers. The information set forth in this complaint is not intended to detail each and every fact and circumstance of the investigation or all information known to me or the investigative participants. Rather, this affidavit serves to establish that probable cause exists to believe that EZEKIEL ALON HAMPTON and KATRINA GRAUMAN committed the crime of conspiracy to distribute cocaine, and possession of cocaine with intent to distribute in violation of Title 21,

1 United States Code, Sections 841(a)(1) and 846; and possessed a firearm in furtherance of a drug  
2 trafficking crime in violation of Title 21, United States Code, Section 924(c).

3 3. On or about February 8, 2008, I was contacted by Detective Ryan Larson,  
4 Lakewood Police Department, who stated that a young female, herein referred to as Jane Doe-1<sup>1</sup>,  
5 had just been picked up by the Lakewood police and transported to St. Clare's Hospital to be  
6 treated for injuries she had sustained during an altercation. During the interview, Jane Doe-1  
7 provided information about EZEKIEL ALON HAMPTON.

8 4. Jane Doe-1 stated that HAMPTON had several girls working for him as  
9 prostitutes. She identified one of the girls as "Katrina".

10 5. Jane Doe-1 also stated that HAMPTON is a "big" crack cocaine dealer and sells  
11 marijuana too. She also stated that HAMPTON carried guns and had "his girls" cut and package  
12 the crack cocaine for him. HAMPTON would store the drugs and guns in female purses.

13 6. On June 24, 2008, the Tacoma Police Department executed two Pierce County  
14 Superior Court search warrants for narcotics. The addresses targeted in the warrants were (1)  
15 The Days Inn, 6902 Tacoma Mall Blvd. #147, Tacoma, Washington and (2) 1928 Martin Luther  
16 King Way, Tacoma, Washington. The suspects of the narcotics investigation were EZEKIEL  
17 ALON HAMPTON and KATRINA GRAUMAN.

18 7. I have reviewed the police report related to these two searches. At the Days Inn,  
19 the law enforcement officers located KATRINA GRAUMAN and Sonya McKay. In the search  
20 of the room, Officer Aaron Quinn, located a plastic bag containing an amount of what appeared  
21 to be crack cocaine. Officer Quinn is a trained narcotics officer and recognized that suspected  
22 crack cocaine was separately packaged consistent with being held for sale to others. This  
23 package was seized. It field tested positive for the presence of cocaine and weighed  
24 approximately 20 grams.<sup>2</sup> There were several condoms in the drawers and in both purses of the  
25

26 <sup>1</sup> The use of Jane Doe-1 is being used to protect the identity of the female and for her  
27 privacy interests.

28 <sup>2</sup> The field test does not test for crack cocaine but only cocaine. However, based upon my the  
observations of Officer Quinn's investigation, I believe that the substance found on this occasion was  
crack cocaine based upon its appearance.

1 females. The room was registered to McKay. Both GRAUMAN and McKay were arrested.  
2 According to a "Declaration for Determination of Probable Cause, Cause No. 08-1-03019-1",  
3 which I reviewed on September 25, 2008, the officers also located a photograph of HAMPTON  
4 on a table top and court documents bearing HAMPTON's name. Two cellular telephones were  
5 seized and one of the telephones had HAMPTON's picture on the screen.

6 8. The officers also located a motorcycle parked outside of room # 147. The  
7 motorcycle is registered to HAMPTON's brother and officers have observed EZEKIEL ALON  
8 HAMPTON repeatedly driving it.

9 9. At the Martin Luther King address, the law enforcement officers located  
10 EZEKIEL HAMPTON and a female, Erica Kay Deleon. HAMPTON is on active Department of  
11 Corrections supervision and lists 1928 Martin Luther King Way, Tacoma as his current address.  
12 Tacoma Police Officer K.P. Smith located what appeared to be suspected cocaine and a loaded  
13 Browning Arms .25 caliber semi-automatic handgun in a lavender colored purse in a bedroom  
14 located on the second floor. The suspected white substance field tested positive for the presence  
15 of cocaine and weighed approximately 117.3 grams, including packaging. In the same purse,  
16 officers found a Department of Health and Social Services document bearing HAMPTON's  
17 name. Also in this bedroom officers found a roll of clear plastic baggies, a box of sandwich  
18 baggies, and mail in HAMPTON's name. There were women's clothes in the closet and the  
19 name "Katrina" over the closet door. Officer Quinn determined that the cocaine was beyond the  
20 amount for personal use.

21 10. Also, in the residence, Officer Bowers located \$3,934.00 in cash, which he noted  
22 was in denominations consistent with street level narcotics sales.

23 11. Prior to the execution of the search warrant, Officer Quinn conducted surveillance  
24 of the Martin Luther King address and observed both EZEKIEL ALON HAMPTON and  
25 KATRINA GRAUMAN entering and exiting that address numerous times. Officer Quinn also  
26 observed both HAMPTON and GRAUMAN exiting the Days Inn. He conducted a background  
27 investigation on 1928 Martin Luther King and determined that both GRAUMAN and  
28 HAMPTON were listed as residing at that address.

1           12. On July 28, 2008, I conducted a second interview of Jane Doe-1. Jane Doe-1  
2 stated that HAMPTON sold crack cocaine out of his house located on Martin Luther King Way.  
3 She observed HAMPTON cooked up crack cocaine at the MLK house on one occasion.  
4 HAMPTON would use his prostitutes to run the crack to customers and assist in selling it.

5           13. Jane Doe-1 was aware that HAMPTON kept his drugs and money in a women's  
6 purse. He would put the identification of one of his girls inside the purse. If the police stopped  
7 him, or searched his car or residence, they would find the illegal contraband in the purse. This  
8 gave HAMPTON denial ability. He would have the girls claim the drugs as theirs.

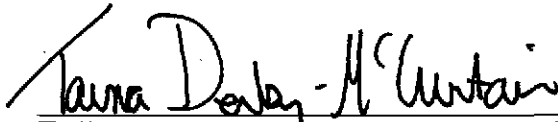
9           14. Recently, I interviewed a cooperating individual (CI) who is facing federal drug  
10 charges and cooperating with the government. The CI indicated that he has known HAMPTON  
11 for about three to four years. The CI was aware that HAMPTON was selling crack cocaine. For  
12 approximately seven to eight months in approximately 2007, the CI was selling crack cocaine to  
13 HAMPTON. During this time period which he estimated to be about seven months, HAMPTON  
14 was purchasing two to three ounces of crack cocaine from the CI. After a while the roles  
15 reversed and the CI began obtaining crack cocaine from HAMPTON. The CI recalled that he  
16 was buying crack cocaine from HAMPTON from the later part of Summer 2007 through October  
17 2007. During this time frame, on one occasion the CI recalled obtaining approximately three to  
18 four ounces of crack cocaine from HAMPTON. On another occasion he bought one to two  
19 ounces of crack cocaine from HAMPTON. The CI was also aware that in the Summer of 2007,  
20 HAMPTON began carrying a firearm which he believed to be a 9 mm semiautomatic handgun.

21           15. On August 11, 2008, Officer Patrick Stephen, Tacoma Police Department  
22 interviewed Jane Doe- 2, who is a minor and worked as a prostitute under the direction of  
23 HAMPTON for about two years. According to Jane Doe-2, HAMPTON would often have the  
24 girls he prostituted carry crack cocaine, ecstasy and marijuana. She stated "Katrina" was the  
25 female he used the majority of the time to carry the drugs. The girls would also sell the narcotics  
26 for HAMPTON.

27           16. I am aware that EZEKIEL HAMPTON has prior felony convictions dating back  
28 to 1993. On or about May 14, 1993 he was convicted of Assault in the First Degree in King

1 County Superior Court cause number 92-1-08027-0 and sentenced to 111 months in prison, and  
 2 is therefore prohibited from possessing a firearm. I have spoken with Special Agent Richard  
 3 Byrd of the Bureau of Alcohol, Tobacco, Firearms, and Explosives and learned that Browning  
 4 handguns are not manufactured in the State of Washington. Therefore, the firearm seized from  
 5 HAMPTON's residence had previously traveled in interstate commerce.

6 16. Based upon the above, I believe there is probable cause that EZEKIEL  
 7 HAMPTON and KATRINA GRAUMAN were involved in a conspiracy to distribute  
 8 cocaine and cocaine base in the form of crack, and that they possessed with intent to distribute  
 9 cocaine base and cocaine, in violation of Title 21, United States  
 10 Code, Sections 841(a)(1), 841(b)(1)(B), and 841(b)(1)(C) and 846, and that EZEKIEL  
 11 HAMPTON and KATRINA GRAUMAN possessed a firearm in furtherance of a drug trafficking  
 12 offense in violation of Title 18, United States Code, Section 924(c), and that EZEKIEL  
 13 HAMPTON possessed a firearm as a convicted felon in violation of Title 18, United States Code,  
 14 Section 922(g)(1).

15  
 16  
 17   
 18 TARNA DERBY-McCURTAIN, Complainant  
 19 Special Agent, FBI

20 Based on the Complaint and Affidavit sworn to before me, and subscribed in my  
 21 presence, the Court hereby finds that there is probable cause to believe the defendants committed  
 22 the offenses set forth in the Complaint.

23 Dated this 25 day of September, 2008

24  
 25  
 26   
 27 KAREN L. STROMBOM  
 28 United States Magistrate Judge